

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF:

Chapter 13

Mack T. Sichta and
Kristie L. McWilliams,
Debtor(s).

Case No. 09-16728

Honorable Manuel Barbosa

**RESPONSE TO TRUSTEE'S NOTICE OF PAYMENT OF FINAL
MORTGAGE CURE AMOUNT UNDER PARAGRAPH (B)(2)(b) OF PLAN**


NOW COMES PNC Mortgage, a division of PNC Bank, National Association as successor by merger to National City Mortgage, a division of National City Bank (hereinafter "PNC Mortgage"), by and through its attorneys, Heavner, Scott, Beyers and Mihlar, LLC, and for its Response to Trustee's Notice of Payment of Final Mortgage Cure Amount Under Paragraph (B)(2)(b), states as follows:

1. On or about May 13, 2009, PNC Mortgage filed its Proof of Claim as Claim Number 2 for a sum of \$2,512.22 in pre-petition arrears.
2. The Debtors' Modified Chapter 13 Plan filed on September 23, 2009 and confirmed on October 2, 2009 set-forth a pre-petition arrearage amount owed to PNC Mortgage \$2,512.22.
3. PNC's pre-petition arrears of \$2,512.22 were paid by the Chapter 13 Trustee in full.
4. The Debtors' post-petition payments to PNC were to be paid by the Debtors directly "outside" of the plan.
5. The Debtors are currently due for seven mortgage payments for the monthly payments due January 2010 through July 2010 in the amount of \$2,519.16 per month and seven late charges in the amount of \$98.64 per month; Less funds in the amount of \$184.76 in Debtors' suspense account for a total default \$18,139.84 as of July 12, 2010.

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WHEREFORE, PNC Mortgage, a division of PNC Bank, National Association prays that the Court declare that the post-petition payments are not current at this time.

PNC MORTGAGE, a division of PNC
Bank, National Association

By: 
One of its attorneys

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